

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MOSAID TECHNOLOGIES INC.,

Plaintiff,

v.

ADOBE SYSTEMS, INC., ALCATEL-
LUCENT USA, INC., APPLE, INC.,
INTERNATIONAL BUSINESS MACHINES
CORP, JUNIPER NETWORKS, INC.,
NETAPP, INC., RED HAT, INC., AND
VMWARE, INC.

Defendants.

C.A. No.: 11-698-GMS

JURY TRIAL DEMANDED

PLAINTIFF'S MOTION FOR LEAVE TO AMEND

Plaintiff MOSAID Technologies Inc. ("MOSAID"), by and through its undersigned counsel, hereby respectfully moves pursuant to Rule 15(a) of the Federal Rules of Civil Procedure to file a Second Amended Complaint for Patent Infringement against the above-named Defendants. The docket indicates that the Defendants have not filed any responsive pleadings in this action, that no Scheduling Order has been entered, and that no prejudice will result from the proposed amendment. The grounds for this Motion are more fully set forth in the accompanying Opening Brief filed contemporaneously herewith.

December 12, 2011

BAYARD, P.A.

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